

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SCOTT REIMER, Individually and On Behalf	:	Civil Action No. 1:08-cv-00411-NRB
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
AMBAC FINANCIAL GROUP, INC., et al.,	:	
	:	
Defendants.	:	
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MARKO BABIC, Individually and On Behalf	:	Civil Action No. 1:08-cv-01273-NRB
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
AMBAC FINANCIAL GROUP, INC., et al.,	:	
	:	
Defendants.	:	
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KEVIN PARKER, Individually and On Behalf	:	Civil Action No. 1:08-cv-01825-NRB
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
AMBAC FINANCIAL GROUP, INC., et al.,	:	
	:	
Defendants.	:	
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NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

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MINNEAPOLIS FIREFIGHTERS' RELIEF	:	Civil Action No. 1:08-cv-01918-NRB
ASSOCIATION, On Behalf of Itself and All	:	
Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
AMBAC FINANCIAL GROUP, INC., et al.,	:	
	:	
Defendants.	:	
	:	
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PLEASE TAKE NOTICE that Institutional Investor Inter-Local Pension Fund GCC/IBT (“Inter-Local Fund”) will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Inter-Local Fund as Lead Plaintiff; (iii) approving Inter-Local Fund’s selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Inter-Local Fund submits herewith a Memorandum of Law and Declaration of Mario Alba Jr., dated March 17, 2008.

DATED: March 17, 2008

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP

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*/s/ Mario Alba Jr.*  
MARIO ALBA JR

SAMUEL H. RUDMAN  
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MARIO ALBA JR.  
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[Proposed] Lead Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I, Mario Alba Jr., hereby certify that, on March 17, 2008, I caused a true and correct copy of the attached:

Notice of Motion for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel;

Memorandum in Support of the Motion of Inter-Local Pension Fund GCC/IBT for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel; and

Declaration of Mario Alba Jr. in Support of the Motion of Inter-Local Pension Fund GCC/IBT for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel.

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to any additional counsel.

/s/ Mario Alba Jr.

Mario Alba Jr.

AMBAC FINANCIAL

Service List - 3/14/2008 (08-0008)

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AMBAC FINANCIAL

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AMBAC FINANCIAL GROUP, INC., et al.,	:	
	:	
Defendants.	:	
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[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD  
PLAINTIFF AND APPROVING SELECTION OF LEAD COUNSEL

	X	
MINNEAPOLIS FIREFIGHTERS' RELIEF	:	Civil Action No. 1:08-cv-01918-NRB
ASSOCIATION, On Behalf of Itself and All	:	
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	:	
Defendants.	:	
	:	
	X	



Having considered the Motion of Inter-Local Pension Fund GCC/IBT (“Inter-Local Fund”) for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel and the Memorandum of Law and Declaration of Mario Alba Jr., in support thereof, and good cause appearing therefore:

1. The Actions are hereby consolidated;
2. Inter-Local Fund is hereby appointed Lead Plaintiff for the Class pursuant to Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE NAOMI R. BUCHWALD  
UNITED STATES DISTRICT JUDGE